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**U.S. DISTRICT COURT**

**DISTRICT OF NEVADA**

NML CAPITAL, LTD.,  
  
Plaintiff,  
  
vs.  
  
THE REPUBLIC OF ARGENTINA,  
  
Defendant.

Case No.: 2:14-cv-00492-RFB-VCF  
  
**STIPULATION AND ORDER TO  
CONTINUE APRIL 11, 2016,  
HEARING ON THE MOTION TO  
STAY AND THE RENEWED  
MOTION TO QUASH**

Plaintiff NML Capital, Ltd. ("NML"), by and through its attorneys of record, Kirk B. Lenhard, Esq., and Nikki L. Baker, Esq., of Brownstein Hyatt Farber Schreck, LLP, and Dennis H. Hranitzky, Esq., of Dechert LLP, intervenor Mossack Fonseca & Co. ("Mossack Fonseca"), by and through its attorneys of record Dennis Campbell, Esq., of Campbell Law Firm PLLC, and Frank M. Flansburg, Esq., of Schwartz Flansburg PLLC, non-parties M.F. Corporate Services (Nevada) Limited ("MF Nevada") and Patricia Amunategui, by and through their attorneys of record, Kent P. Woods, Esq., of Woods Erickson & Whitaker LLP, and non-party Val de Loire, LLC ("VDL"), by and through its attorney of record, Jason M. Wiley, Esq., of Armstrong Teasdale LLP (NML, MF Nevada, Ms. Amunategui, VDL, and Mossack Fonseca are

1 collectively referred to as the "Parties"), hereby agree and stipulate, subject to the Court's  
2 approval, as follows ("Stipulation"):

3 1. On March 4, 2016, the Parties entered into a Stipulation continuing the March 7,  
4 2016, hearing on VDL's Motion to Stay Pending Appeal Without Bond Pursuant to Fed. R. Civ.  
5 P. 62 ("Motion to Stay") [D.E. 204] and Mossack Fonseca's Renewed Motion to Quash  
6 ("Renewed Motion to Quash") for April 11, 2016. [D.E. 228];  
7

8 2. The basis for the Parties initial request was NML's filing of a status report  
9 informing the Court of the status of the settlement discussions between NML and the Republic of  
10 Argentina in the underlying dispute. [D.E. 226]. As set forth in the Status Report, NML signed  
11 an agreement-in-principle ("AIP") with Argentina that would resolve all pending litigation  
12 between NML and Argentina, including the instant dispute before the Court. The "AIP" is  
13 subject to approval by the Argentine legislature and other conditions, and is due to be funded on  
14 or before April 14, 2016;  
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16 3. The Court granted the Parties' request on March 4, 2016. [D.E. 229];  
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4. In light of the timetable outlined above, the Parties hereby agree, subject to the Court's approval that the April 11, 2016, hearing on the Motion to Stay and the Renewed Motion to Quash be continued to the first available date in May 2016.

DATED this \_\_\_\_ day of March, 2016.

**BROWNSTEIN HYATT FARBER  
SCHRECK, LLP**

By: /s/ Nikki L. Baker  
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*Attorneys for M.F. Corporate Services  
(Nevada) Limited and Patricia Amunategui*

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**ARMSTRONG TEASDALE LLP**

By: /s/ Jason M. Wiley  
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Las Vegas, NV 89145

*Attorneys for Val de Loire, LLC, and  
The 123 Entities*

1 **IT IS SO ORDERED.**

2 The Parties request is GRANTED. The hearing on VDL's Motion to Stay [D.E. 204] and  
3 Mossack Fonseca's Renewed Motion to Quash shall be continued to May 26th, 2016, at  
4 10:00 a.m./p.m

5  
6 DATE this 4th day April, 2016.



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9 RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

10 Respectfully submitted by:

11 SCHWARTZ FLANSBURG PLLC

12  
13 By /s/ Frank M. Flansburg, III

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